

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 15-cr-30091-MJR
	)	
KIARA HOPKINS,	)	
	)	
Defendant.	)	

**STIPULATION OF FACTS**

The attorney for the United States and the attorney for the Defendant have engaged in discussions and have stipulated to the following facts to support the plea of guilty in accordance with U.S.S.G. § 6B1.4.

1. **KIARA HOPKINS**, during all relevant times, lived in Belleville, Saint Clair County, which is located in the Southern District of Illinois.

2. **KIARA HOPKINS** defrauded the State of Illinois Medicaid Home Services Program by falsely claiming and taking payments for personal assistant services not actually performed. The State of Illinois pays a personal assistant hourly wages for performance of services for a qualified beneficiary. The qualified beneficiary must have a written Employment Agreement with the personal assistant and/or an Individual Provider Payment Policies form. The qualified beneficiary must have a Service Plan listing all services to be provided. In order for the personal assistant to receive payment from the State of Illinois, the beneficiary must submit a Home Services Program Time Sheet form listing the hours worked by the personal assistant and signed by both the beneficiary and personal assistant.

3. The Home Services Program is a Medicaid Waiver Program designed to provide a disabled individual who, with assistance in performing daily living activities in the home, would not require similar care in a nursing home. The Illinois Department of Human Services, Division of Rehabilitation Services (DORS) administers the program. Medicaid Waiver programs enable states to use both state and federal Medicaid funds to pay for services related to medical care that would not ordinarily be covered under Medicaid.

4. On October 2, 2012, **HOPKINS** signed a DHS Division of Rehabilitation Services (DORS) Individual Provider Payment Policies form (IL488-2252) acknowledging her understanding of DORS Home Services policies including the following:

- *Individual Providers can only be paid for the hours they worked for the customer per the HSP Service Plan. Billing for hours not worked constitutes Medicaid fraud.*
- *Individual Providers can only be paid for hours and tasks performed in the customer's home unless the task must be completed outside the home such as laundry due to no facilities in the home, banking, and grocery shopping.*
- *Individual Providers are not allowed to subcontract. Subcontracting means letting someone else work in your place, putting the time on your time sheet and then paying them yourself. This is not only an illegal practice but also causes problems with Social Security withholding. Each Individual Provider will only be paid for services which he or she provided directly to the customer.*
- *Individual Providers cannot charge HSP for the same hours worked when working another job. This includes working for other HSP customers or as a childcare provider paid through the Department of Human Services. This constitutes fraud and will be prosecuted as such.*

5. From July 22, 2013, until November 26, 2013, in furtherance of a scheme to defraud the Medicaid Home Services Program for the State of Illinois, **HOPKINS** submitted Home Service Time Sheets of which she falsely claimed hours of personal assistant services that were not performed on the dates and times as reported on the Home Services Time Sheet because

the beneficiary/customer was not home but actually in a nursing home. **HOPKINS** signed the time sheet under the following printed information:

*I certify that the above information is true and in accordance with the Individual Provider Payment Policies (IL488-2252). I understand falsification of any information submitted on this form could lead to criminal prosecution.*

6. **KIARA HOPKINS** admits that she did knowingly and willfully execute the scheme to defraud a health care benefit program, affecting interstate commerce, namely Medicaid, in connection with the delivery of and payment for health care benefits and services by submitting time sheets and receiving payment for personal assistant services not performed.

7. As a result of falsely claiming services, **KIARA HOPKINS** obtained \$3,779.14 in payments for personal assistant services not actually performed for a Medicaid beneficiary.


8. The Defendant's actions as charged in the Indictment occurred within the Southern District of Illinois.

**IT IS SO STIPULATED.**

JAMES L. PORTER  
Acting United States Attorney

  
KIARA HOPKINS  
Defendant

  
WILLIAM E. COONAN  
Assistant United States Attorney

  
G. ETHAN SKAGGS  
Attorney for Defendant

Dated: 1/28/, 2016

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